

1 DEVERIE J. CHRISTENSEN, ESQ.
Nevada State Bar No. 6596
2 KIRSTEN A. MILTON, ESQ.
Nevada State Bar No. 14401
3 HILARY A. WILLIAMS, ESQ.
Nevada State Bar No. 14645
4 **JACKSON LEWIS P.C.**
300 S. Fourth Street, Suite 900
5 Las Vegas, Nevada 89101
6 Tel: (702) 921-2460
Fax: (702) 921-2461
7 Email: Deverie.Christensen@jacksonlewis.com
8 Email: Kirsten.Milton@jacksonlewis.com
Email: Hilary.Williams@jacksonlewis.com

9 *Attorneys for Defendants Wood Residential, LLC,*
10 *Wood Partners, LLC, and Wood Real Estate*
11 *Investors, LLC*

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 VANESSA NELSON

15 Plaintiff,

16 vs.

17 WOOD RESIDENTIAL, LLC; WOOD
18 PARTNERS, LLC; WOOD REAL ESTATE
INVESTORS, LLC; and DOES 1-50,
19 inclusive,

20 Defendants.

Case No. 2:24-cv-00419-ART-BNW

**STIPULATION TO EXTEND THE
DEADLINE TO RESPOND TO
PLAINTIFF'S AMENDED
COMPLAINT**

21
22 IT IS HEREBY STIPULATED by and between the parties, through their respective counsel,
23 that Wood Residential, LLC ("Wood Residential"), Wood Real Estate Investors, LLC ("WREI"),
24 and Wood Partners, LLC ("Wood Partners")(collectively "Defendants"), shall have an additional
25 two (2) weeks, up to and including Friday, March 22, 2024, in which to respond to Plaintiff Vanessa
26 Nelson's ("Plaintiff") Amended Complaint. This stipulation is submitted and based upon the
27 following:

28 ///

1 1. On December 28, 2023, Plaintiff filed a Complaint against Defendants in the Eighth
2 Judicial District Court, Clark County, Nevada asserting seven claims under Nevada state law.

3 2. After Defendants filed motions to dismiss, Plaintiff filed an Amended Complaint
4 against Defendants on February 17, 2024.

5 3. The Amended Complaint included twelve causes of action and asserted, for the first
6 time, collective claims under the Fair Labor Standards Act and class action wage related claims
7 under Nevada Revised Statutes Chapter 608.

8 4. Defendants removed this action to federal court on March 1, 2024, prior to
9 responding to the Amended Complaint.

10 5. Pursuant to Federal Rule of Civil Procedure 81(c)(2), Defendants currently have
11 until March 8, 2024 (seven days after the filing of the notice of removal) to respond to the Amended
12 Complaint.

13 6. However, Defendants' Counsel, Hilary Williams, has been ill, and given the five
14 additional claims and new collective and class action allegations, Defendants need additional time
15 to respond.

16 7. The parties agree that Defendants shall have an additional two weeks, up to and
17 including Friday, March 22, 2024, to respond to the Plaintiff's Amended Complaint.

18 8. The parties have also entered into a separate agreement to toll the statute of
19 limitations on Plaintiff's claims, including the putative class and collective claims, during the two-
20 week extension from March 8 through March 22, 2024.

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

9. This request is made in good faith and not for the purpose of delay.

Dated this 8th day of March, 2024.

RAFII & ASSOCIATES, P.C.

JACKSON LEWIS P.C.

/s/ Jason Kuller

Jason Kuller, Esq., Bar No. 1224
Shay Degenan, Esq., Bar No. 16397
1120 N. Town Center Drive, Suite 130
Las Vegas, Nevada 89144
Attorneys for Plaintiff

/s/ Deverie J. Christensen

Deverie J. Christensen, Esq., Bar No. 6596
Kirsten A. Milton, Esq., Bar No. 14401
Hilary A. Williams, Esq., Bar No. 14645
300 S. Fourth Street, Suite 900
Las Vegas, Nevada 89101
Attorneys for Defendants

ORDER

IT IS HEREBY ORDERED that the deadline for Defendants Wood Residential, LLC, Wood Partners, LLC and Wood Real Estate Investors, LLC to respond to Plaintiff's Amended Complaint is extended to Friday, March 22, 2024.

Dated this 11 day of March, 2024.


United States District Court/Magistrate Judge